

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
ANDERSON DIVISION

Paige Elizabeth Burrows,

Plaintiff

vs.

Kyle Clyde Ryan and Anthony James Ryan  
Jr.,

Defendant.

CA NO.: 8:18-CV-00314

**NOTICE OF APPEARANCE AND  
CONDITIONAL ANSWER  
(UNDERINSURED MOTORIST)**

**Jury Trial Demanded**

**PLEASE TAKE NOTICE** that the undersigned attorneys hereby appear on behalf of Esurance Insurance Companies in the above entitled action and, further, give notice that this potential underinsured motorist carrier may provide a defense and, further, request that copies of all pleadings and discovery served in this action by all parties be served upon the undersigned at the address given below. The potential underinsured motorist carrier specifically demands a trial by jury pursuant to Rule 38 of the South Carolina Rules of Civil Procedure. The undersigned further states that he and his law firm at this time do not represent the defendant(s) and are not at this time undertaking such representation but are specifically reserving the option to assume control of the defense in the name of the defendant(s) pursuant to the underinsured motorist statute should the carrier choose to exercise that option.

This appearance is made pursuant to S.C. Code §38-77-160 (1976, as amended). To the extent that a responsive pleading is required, the undersigned denies each and every allegation of the Complaint, asserts those affirmative defenses set forth in Rule 8

of the South Carolina Rules of Civil Procedure, contests service and personal jurisdiction, and raises those defenses set forth in Rule 12, all to the extent they are applicable.

The undersigned reserves the right to file a full Answer at such time it assumes the defense of this case or thereafter.

In filing this notice, Esurance Insurance Companies makes no representations or admissions to the existence, applicability or amount of any insurance coverage. This filing and all activities in this case are undertaken under a reservation of rights.

ROSS CANGELOSI & ASSOCIATES

*s/ Trevor A. Cangelosi*

Trevor A. Cangelosi

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Attorney for Esurance Insurance Companies,  
appearing pursuant to S.C. Code §38-77-160

Charleston, South Carolina

April 3, 2018